

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

GUARDIAN OPERATIONS LLC, a  
Washington limited liability company,

Plaintiff-  
Counterdefendant,

vs.

TRISTATE ROOFING INC., a Washington  
corporation,

Defendant-  
Counterclaimant.

CIVIL ACTION No. 2:24-cv-00430-JHC

STIPULATED MOTION FOR  
EXTENSION OF TIME OF ALL  
DEADLINES & ORDER

Plaintiff and Counterdefendant Guardian Operations LLC, (“Guardian”) and Defendant Counterclaimant Tristate Roofing, Inc. (“Tristate”), by and through its undersigned attorneys, respectfully request that the Court extend all deadlines in this action as follows:

1. In order to provide the parties with additional time to negotiate a settlement, the parties agree that the time for all deadlines in this case should be extended by at least 30 days.

2. Good Cause exists for this extension as the parties are negotiating in good faith to settle this dispute and require additional time to come to an agreement. Having additional time to engage in further discussions will be beneficial to the potential for an early resolution.

3. The parties respectfully request that the Court enter the below Order extending the existing deadlines as follows:

- a. **July 17, 2024:** Guardian's opposition deadline to Tristate's Motion to Strike Counterclaim Defendant's Affirmative Defenses ("Motion to Strike") (Dkt. 13) (previously June 17, 2024);
- b. **July 22, 2024:** Noting date for Motion to Strike and deadline for Tristate's reply to Guardian's opposition to Motion to Strike (previously June 21, 2024);
- c. **July 24, 2024:** Tristate's opposition deadline to Guardian's Motion for Judgment on the Pleadings ("Motion for Judgment on the Pleadings") (Dkt. 14) (previously June 24, 2024);
- d. **July 25, 2024:** Deadline for FRCP 26(f) Conference (previously June 25, 2024);
- e. **July 31, 2024:** Noting date for Motion for Judgment on the Pleadings and deadline for Guardian's reply to Tristate's opposition to Motion for Judgment on the Pleadings (previously July 1, 2024);
- f. **August 8, 2024:** Initial Disclosures Pursuant to FRCP 26(a)(1) (previously July 9, 2024);
- g. **August 15, 2024:** Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f) (previously July 16, 2024).

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1 DATED this 17th day of June, 2024

DORSEY & WHITNEY LLP

2 *s/ J. Michael Keyes*

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20 *Counsel for Defendant Tristate Roofing Inc.*

21 **ORDER**

22 Based on the foregoing stipulation of the parties and good cause shown, IT IS HEREBY  
23 ORDERED that the deadlines in this action are extended as follows:

- 24 • July 17, 2024: Guardian's opposition deadline to Tristate's Motion to Strike  
25 Counterclaim Defendant's Affirmative Defenses ("Motion to Strike") (Dkt. 13);
- July 22, 2024: Noting date for Motion to Strike and deadline for Tristate's reply to  
Guardian's opposition to Motion to Strike;
- July 24, 2024: Tristate's opposition deadline to Guardian's Motion for Judgment on  
the Pleadings ("Motion for Judgment on the Pleadings") (Dkt. 14);
- July 25, 2024: Deadline for FRCP 26(f) Conference;

- July 31, 2024: Noting date for Motion for Judgment on the Pleadings and deadline for Guardian's reply to Tristate's opposition to Motion for Judgment on the Pleadings;
- August 8, 2024: Initial Disclosures Pursuant to FRCP 26(a)(1);
- August 15, 2024: Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f).

DATED this 18th day of June, 2024.



John H. Chun  
UNITED STATES DISTRICT JUDGE